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October 9, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Presentation*
GN Docket Nos. 17-183, 18-122

Dear Ms. Dortch:

Per Federal Communications Commission ("FCC" or "Commission") Rule 1.1206, this letter provides notice that on October 4, 2018, the Parties listed on Attachment A met with Rachael Bender, Legal Advisor to Chairman Ajit Pai, concerning the above-referenced proceedings.

The Parties discussed the recently formed C-Band Alliance, a consortium of satellite operators with four founding members: Intelsat, SES, Eutelsat and Telesat, and provided a copy of the press release attached hereto as Attachment B. The Parties noted that the C-Band Alliance members account for virtually all of the operational C-Band satellite downlink service in the continental United States.

The Parties explained that the stated mission of the C-Band Alliance aligns with the FCC's goals and provided a copy of the Mission Statement attached hereto as Attachment C. The Parties discussed how the Market-Based Approach is best-suited to achieve faster 5G deployment in mid-band spectrum by freeing up a portion of the 3.7-4.2 GHz band for terrestrial mobile use voluntarily, expeditiously, and efficiently, while fully protecting incumbent satellite services. The Parties also noted that allowing new point-to-multipoint operations in the 3.7-4.2 GHz C-band would frustrate, rather than achieve, the Commission's 5G policy goals.

Additionally, the Parties shared their progress working with customers to gain support for the Market-Based Approach. This has included engaging with trade associations and individual companies, to provide more details related to ensuring the protection of antennas. The Parties also noted that they are continuing to encourage customers to register their receive-only earth stations by October 17, 2018 and providing assistance, where needed. The Parties closed by encouraging the Commission to adopt the Market-Based Approach soon after the comment pleading cycle concludes.

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Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Jennifer D. Hindin

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Wiley Rein LLP

Attachments

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Attachment A

Intelsat Corporation:

Susan Crandall, Associate General Counsel of Intelsat Corporation (“Intelsat”)

Jennifer Hindin of Wiley Rein LLP, counsel for Intelsat

Henry Gola of Wiley Rein LLP, counsel for Intelsat

SES Americom, Inc.:

Gerry Oberst, President of SES Americom, Inc. (“SES”)

Petra Vorwig, Senior Legal & Regulatory Counsel, SES

Michele Farquhar of Hogan Lovells US LLP, counsel for SES

Karis Hastings of SatCom Law LLC, counsel for SES

Intel Corporation:

Peter Pitsch, Associate General Counsel of Intel Corporation

C-Band Alliance:

Preston Padden, Head of Advocacy and Government Relations, C-Band Alliance

Attachment B



Intelsat, SES, Eutelsat and Telesat Establish the C-Band Alliance (CBA), a Consortium to Facilitate Clearing of U.S. Mid-band Spectrum for 5G While Protecting U.S. Content Distribution and Data Networks

- *The CBA will enable a breakthrough market-based approach to managing and funding spectrum clearing in a way that protects incumbent users and their content distribution and data networks in the U.S. from potential interference*
- *Consortium will implement market-based transactions and clear certain spectrum in the U.S., accelerating access to support 5G service introduction*
- *Agreement reflects transition facilitator role contemplated in FCC proposed rulemaking*
- *The CBA names Bill Tolpegin as CEO and Preston Padden as Head of Advocacy and Government Relations*

Washington D.C., October 1, 2018 – Leading global satellite operators – Intelsat (NYSE: I), SES (Euronext Paris: SESG), Eutelsat (Euronext Paris: ETL) and Telesat announced today the creation of a consortium called the C-Band Alliance, or CBA, in a move that could accelerate making mid-band spectrum available for 5G services.

The CBA is designed to act as a facilitator as described in a recent U.S. Federal Communications Commission (FCC) proceeding featuring the companies' market-based proposal to clear a portion of C-band spectrum in the United States. The formation of the CBA is a significant achievement and demonstrates the industry alignment necessary to make this mid-band spectrum available quickly, thus supporting the U.S. objective of winning the race to introduce terrestrial 5G services.

The market-based proposal was developed in response to a proceeding initiated by the FCC in August 2017, which led to the Notice of Proposed Rulemaking (NPRM) that was formally approved by the FCC on July 12, 2018 and published in the Federal Register of August 30, 2018. The proposal reflects the unique U.S. telecommunications environment and aims to protect the quality and reliability of the extensive services provided by satellite operators in the C-band spectrum to U.S. broadcasters, media, and data companies. The proposal establishes a commercial and technical framework that would enable terrestrial mobile operators to quickly access spectrum in a portion of the 3,700 to 4,200 MHz frequency band in the U.S., speeding the deployment of next-generation 5G services.

The proposal specifies the use of a consortium, now known as the CBA, to undertake the technical and commercial implementation of the spectrum clearing process. This process is necessary to repurpose the C-band spectrum for use in a 5G environment. The CBA will be led, effective immediately, by Bill Tolpegin, currently CEO of OTA Broadcasting, who will serve as

Chief Executive Officer of CBA. Media sector veteran Preston Padden will serve as Head of Advocacy and Government Relations.

A significant milestone in the progression of the proposal, the establishment of the CBA signifies that the satellite operators delivering the vast majority of satellite C-band services in the U.S. have agreed upon the key technical and commercial steps necessary to enable commercial implementation of the spectrum clearing process. The CBA also ensures that customer services are protected from potential interference as new wireless services are introduced into the cleared portion of the spectrum.

About Intelsat

Intelsat (NYSE: I) operates the world's first Globalized Network, delivering high-quality, cost-effective video and broadband services anywhere in the world. Intelsat's Globalized Network combines the world's largest satellite backbone with terrestrial infrastructure, managed services and an open, interoperable architecture to enable customers to drive revenue and reach through a new generation of network services. Thousands of organizations serving billions of people worldwide rely on Intelsat to provide ubiquitous broadband connectivity, multi-format video broadcasting, secure satellite communications and seamless mobility services. The end result is an entirely new world, one that allows us to envision the impossible, connect without boundaries and transform the ways in which we live. For more information, visit www.intelsat.com.

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About SES

SES is the world-leading satellite operator and the first to deliver a differentiated and scalable GEO-MEO offering worldwide, with more than 50 satellites in Geostationary Earth Orbit (GEO) and 16 in Medium Earth Orbit (MEO). SES focuses on value-added, end-to-end solutions in two key business units: SES Video and SES Networks. The company provides satellite communications services to broadcasters, content and internet service providers, mobile and fixed network operators, governments and institutions. SES's portfolio includes SES Americom, one of the earliest operators of commercial GEO satellites, SES Government Solutions, which is exclusively focused on the needs of the U.S. Government, as well as GovSat, a 50/50 public-private partnership between SES and the Luxembourg government. SES also owns the ASTRA satellite system, which has the largest DTH television reach in Europe, MX1, a leading media service provider offering a full suite of innovative services for both linear and digital distribution, and O3b, the only non-geostationary system delivering fibre-like broadband services. SES is listed on the Euronext Paris and Luxembourg Stock Exchange (ticker: SESG). For further information, visit www.ses.com.

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About Eutelsat Communications

Founded in 1977, Eutelsat Communications is one of the world's leading satellite operators. With a global fleet of satellites and associated ground infrastructure, Eutelsat enables clients across Video, Data, Government, Fixed and Mobile Broadband markets to communicate effectively to their customers, irrespective of their location. Over 6,900 television channels operated by leading media groups are broadcast by Eutelsat to one billion viewers equipped for DTH reception or connected to terrestrial networks. Headquartered in Paris, with offices and teleports around the globe, Eutelsat assembles 1,000 men and women from 46 countries who are dedicated to delivering the highest quality of service.

Eutelsat Communications is listed on the Euronext Paris Stock Exchange (ticker: ETL).

For more about Eutelsat go to www.eutelsat.com

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About Telesat

Telesat is a leading global satellite operator, providing reliable and secure satellite-delivered communications solutions worldwide to broadcast, telecom, corporate and government customers. Headquartered in Ottawa, Canada, with offices and facilities around the world, the company's state-of-the-art fleet consists of 17 GEO satellites, the Canadian payload on ViaSat-1 and one Phase 1 LEO satellite which is the start of Telesat's planned global LEO satellite constellation that will offer low latency, high throughput broadband services. Telesat is also a leading technical consultant providing high value expertise and support to satellite operators, insurers and other industry participants on a global basis. Privately held, Telesat's principal shareholders are Canada's Public Sector Pension Investment Board and Loral Space & Communications Inc. (NASDAQ: LORL). For more information, visit www.telesat.com.

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About the C-Band Alliance

The C-Band Alliance, or CBA, is the organization tasked with the safe and efficient clearing and repurposing of C-band spectrum, supporting the United States in its goal of leadership in 5G deployment and innovation through. While implementing the breakthrough, market-based proposal to clear spectrum, the CBA will also protect the quality and reliability of existing C-band services, providing current users certainty and operational integrity. For more information, visit www.C-BandAlliance.com.

Attachment C

C-Band Alliance

Who is the CBA?

The C-band Alliance was formed by the four satellite operators that provide the vast majority of C-band satellite services in the U.S.

This same group of satellite operators proposed to the FCC a breakthrough market-based proposal to clear portions of this C-band spectrum to support the introduction of 5G services in the U.S. Critically, this proposal also protects the valuable satellite-delivered services provided by C-band.

What is the mission of the CBA?

- The CBA is the organization that will facilitate safely and efficiently clearing and repurposing C-band spectrum, speeding U.S. leadership in 5G deployment and innovation.
- The CBA will engage in secondary market-based transactions to expand use of C-band in 18 to 36 months from an FCC order. This will position service providers to deliver 5G services to consumers throughout America, in cities and non-urban areas, unleashing meaningful growth for the U.S. economy.
- As it leads these efforts, the CBA will protect the quality and reliability of the extensive services provided by satellite operators in the C-band spectrum to U.S. broadcasters, media, and data companies.

Attachment C

Key Advocacy Positions

It Is Important for America to Lead in 5G

- 5G is about far more than faster downloads on mobile devices. According to a report by Deloitte, “countries that adopt 5G first are expected to experience disproportionate gains in macroeconomic impact compared to those that lag.”
 - “Deloitte – 5G: The Chance to Lead for A Decade” (Deloitte Report)
- Currently America is lagging behind China and other countries in allocating spectrum for 5G.
 - “China 'has the edge' in the war for 5G and the US and Europe could fall behind” (CNBC)

Repurposing C-band “Mid-Band Spectrum” Is Essential To Assure That All Americans Get Access to 5G

The U.S. geography and population dispersion are unique, and thus spectrum requirements are complex.

High frequency mmWave spectrum will carry vast amounts of 5G data short distances in America’s dense urban canyons. But trying to extend mmWave 5G across all of America, including rural areas, would be like trying to cut your grass with a pair of scissors – futile.

Wireless communication experts identify mid-band spectrum as the “sweet spot” between the broad coverage of low-band spectrum and the density of high-band spectrum that is required to serve the U.S. They maintain that expanding the use of C-band spectrum to wireless carriers will be essential to bringing 5G to all Americans.

Attachment C

Secondary Market Transactions Are the Only Way to Repurpose Mid-Band Spectrum in a Timely Manner

An FCC auction of mid-band spectrum could not take place until 2021-2022 or later. Litigation with current satellite operators could push that date much further into the future. By that time, the United States would be a small object in China's 5G rearview mirror.

By contrast, secondary market transactions can be completed very quickly with transparency and with regard for the balance of wireless industry competition. It is our intention to repurpose spectrum as fast as possible.

Current C-Band FSS Customers Must Continue to Be Served

Only the proposal of the C-band carriers begins with the question "How much spectrum do we need to retain to serve our customers and their consumers?" Every other proposal puts at risk C-band service to existing cable, broadcast and programmer customers and their more than 100 Million U.S. television households and radio listeners. C-band satellite operators are committed to ensuring that their customers, and thus U.S. consumers, continue to receive quality service with no disruptions. And the C-Band carriers will make their customers whole for the cost of the transition.

It is important that C-Band remain the high quality and reliable distribution method of choice for video providers. The amount of spectrum to be cleared and repurposed will be determined by (1) how much spectrum must be retained to continue serving all existing customers and their consumers, (2) the cost of clearing and (3) market demand for the spectrum.